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February 26th, 2020

U.S. Election Assistance Commission
1335 East West Highway, Ste. 4300
Silver Spring, MD 20910

Re: ECO 01387 AutoBallot Barcode Scanner

Dear Mr. Lovato

At the request of Hart InterCivic, SLI is providing an assessment of ECO-01387, including supporting documentation provided by Hart InterCivic, to determine if this change is De Minimis, and no additional testing is required.

Summary Description:

The COTS (Commercial Off the Shelf) handheld barcode scanner that Hart uses with its optional AutoBallot kit, the Zebra DS4308, has reached end-of-life. The new DS4608 is the manufacturer's suggested replacement for the DS4308 model.

Reference Documents:

- EAC 2005 Voluntary Voting System Guidelines (VVSG) Volume II, Sec. 1 & 4
- EAC Voting System Testing and Certification Program Manual V. 2, Sec. 3.4 & 3.5
- NOC 12-01 COTS Computer Equivalency for de minimis Change

Documentation used in SLI's Assessment:

- ECO-01387 Summary - 4005661 Rev A.01 - AutoBallot Barcode Scanner Update
- Datasheets:
 - DS4308 EOS PMB.pdf
 - Zebra ds4308.pdf
 - Zebra ds4608.pdf
- Approved Manufacturers List
 - 3005174-RevB AMLs.pdf
 - 3005174-RevC AMLs.pdf

Conclusion:

Regarding the Hart ECO 01387 replacement of the handheld COTS barcode scanner due to end of life on the optional handheld COTS barcode scanner, SLI performed a comparison of key specifications for the barcode scanner and their preferred replacement. The analysis showed the manufacturer specifications are equivalent or better for the preferred replacement barcode scanner with respect to performance characteristics, environmental compliance, operating environment, and regulatory certifications.

Based upon the examination of ECO 01387 with supporting documentation, including Hart's internal integration testing on all supported devices (Print, Touch Writer, and Controller) to verify compatibility. SLI considers the nature of this change to be De Minimis and therefore not to affect the Federal certification status for all applicable Verity releases. No additional testing is required at this time.

As required under section 3.4.3 of the EAC's Voting System Testing and Certification Program Manual Version 2.0, Hart InterCivic has provided the necessary information to verify the ECO 01387 change is De Minimis.

If you have questions regarding this assessment, please contact Darrick Forester.

Sincerely,

A handwritten signature in blue ink, appearing to read "Traci Mapps".

Traci Mapps
Director